

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 4

61 Forsyth Street, S.W.
Atlanta, Georgia 30303

MEMORANDUM

DATE: September 3, 2013

SUBJECT: 35th Avenue Site Surface Soil Data Consult
Birmingham, Alabama

FROM: Kevin Koporec, Toxicologist
Technical Support Section
Superfund Support Branch *KK*

THROUGH: Glenn Adams, Chief
Technical Support Section
Superfund Support Branch *GA*

TO: Greg Harper, OSC
Richard Jardine, OSC
Superfund Emergency Response & Removal Branch

As you requested in your August 30, 2013 e-mail, we have reviewed the summary data from table attached to your e-mail (High Exceedance of RML Properties Aug2013). The samples were recently collected from properties within the 35th Avenue Site in Birmingham, Alabama. It is understood that these properties include currently occupied residential and vacant properties (plus some churches and schools) in the neighborhoods of Harriman Park, Collegeville, and Fairmont and that surface soil sampling has been conducted at approximately 1100 parcels in the area.

The summary table provides data for approximately four dozen parcels that exhibit soil concentrations that are significantly higher than EPA's Removal Management Levels (RMLs) (for arsenic, and/or benzo(a)pyrene an order of magnitude higher than the carcinogenic based RMLs; for lead 3 times higher than the noncarcinogenic based RML). Based on this information, you are proposing a removal action on these properties to minimize or eliminate the potential exposure to residents that may be exposed to these higher concentration parcels. The proposed strategy is to physically excavate and dispose of the contamination to a depth of up to 12 inches where practicable and replace with clean soil (i.e., soils with no concentrations above acceptable risk levels) back in the excavated areas.

It is understood that all of the data collected was screened against EPA's RMLs, but that you are prioritizing any properties that have concentrations of lead greater than 1,200 mg/Kg, arsenic greater than 390 mg/Kg, and/or benzo(a)pyrene greater than 15 mg/Kg. It is also understood that you are focusing on only those properties that have potential current exposures. Also, if a property had an exceedance of an RML but less than the concentrations above or the property is currently vacant and not accessible, there may be actions taken in the future, but they are not currently being addressed.

Based on the information in your e-mail and attached table, which is summarized above, TSS agrees with your proposed plan of action.

Feel free to contact us if you need further assistance on risk assessment issues.